



250 Vesey Street
27th Floor
New York, NY 10281

wmhwlaw.com
T: 212-335-2030
F: 212-335-2040

May 9, 2025

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Alexander*, Docket No. 24-CR-00676 (VEC)

Dear Judge Caproni:

On behalf of Tal Alexander, Oren Alexander, and Alon Alexander (the “Defendants”), we respectfully submit this request to withdraw our May 5, 2025 request for a conference regarding scheduling. *See* ECF No. 60. In addition, the Defendants and the Government jointly request an order entering the proposed modified schedule outlined below.

On May 8, 2025, after we submitted the above-mentioned request for a conference, the Government filed a second superseding indictment. ECF No. 63. This indictment adds six additional counts, including counts related to four additional alleged victims not named in the prior indictment. With the second superseding indictment now filed, we share in the Court’s initial view and the Government’s position that a conference is not necessary. Nonetheless, given the expansion of the charges, and defense pretrial motions due in less than two weeks, the Defendants and the Government request a modification of the current scheduling order (*see* ECF No. 53) as follows.

Pretrial Motions

- Defendants’ pretrial motions due by June 16, 2025 (currently May 20, 2025)
- Government’s response due by July 18, 2025 (currently June 20, 2025)
- Defendants’ reply due by August 1, 2025 (currently June 27, 2025)

Expert Submissions

- Government’s expert disclosure due by August 15, 2025 (currently June 13, 2025)
- Defendants’ expert disclosure due by August 29, 2025 (currently June 27, 2025)
- Government’s rebuttal expert disclosure due by September 5, 2025 (currently July 3, 2025)
- Parties to notify the Court of any *Daubert* motions by September 20, 2025 (currently July 18, 2025)

Motions *in Limine* and Requests to Charge

- Parties’ motions *in limine* and requests to charge due by October 3, 2025 (currently September 5, 2025)
- Responses to motions *in limine* due by October 27, 2025 (currently September 19, 2025)

Finally, we have conferred with the Government regarding scheduling an arraignment on the recent indictment. The defense requests the afternoon of June 10, 2025, if amenable to the Court, as counsel for Alon and Oren Alexander, who are based in Florida, will be in New York for an argument that morning in the Second Circuit on the bail appeal in this matter. The Government is also available on that date. Thank you for your consideration.

Respectfully submitted,

/s/ Milton L. Williams

Milton L. Williams

Deanna M. Paul

Alexander Kahn

Attorneys for Defendant Tal Alexander

/s/ Howard Srebnick

Howard Srebnick

Jason Goldman

Attorneys for Defendant Alon Alexander

/s/ Richard Klugh

Richard Klugh

Attorney for Defendant Oren Alexander

cc: All counsel via ECF